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*Attorneys for Plaintiffs Valley Health Systems, LLC
DVH Hospital Alliance, LLC and
Summerlin Hospital Medical Center, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VALLEY HEALTH SYSTEM, LLC, a Delaware
Limited Liability company, DVH HOSPITAL
ALLIANCE, LLC, a Delaware Limited Liability
company, and SUMMERLIN HOSPITAL
MEDICAL CENTER, LLC, a Delaware Limited
Liability company,

Plaintiffs,

vs.

TRAVEL INSURANCE FACILITIES, PLC, a
Foreign Corporation, UNION
REISEVERSICHERUNG
AKTIENGESELLSCHAFT, a Foreign
Corporation,

Defendants.

CASE NO.: 2:22-CV-00365-ART-DJA

**PLAINTIFF'S LOCAL RULE IA 6-1.
MOTION FOR ENLARGEMENT OF
TIME TO EFFECTUATE SERVICE**

COME NOW, Plaintiffs, Valley Health System, LLC, DVH Hospital Alliance, LLC, and
Summerlin Hospital Medical Center, LLC, (collectively, "Plaintiffs"), by and through their

undersigned counsel, and, pursuant to Local Rule 6-1 hereby move this Honorable Court for an enlargement of time for an additional ninety (90) days through and including July 27, 2022 within which to effectuate service of the Summons, Complaint and Standing Order upon Defendants, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation, and UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT, a Foreign Corporation and state as follows:

1. Since the filing of the Complaint, the Plaintiff has attempted to obtain service of the Summons, Complaint and Standing Order on Defendants, TRAVEL INSURANCE FACILITIES, PLC, a Foreign Corporation (“TIF”), and UNION REISEVERSICHERUNG AKTIENGESELLSCHAFT, a Foreign Corporation (“URV”) through the Hague Convention.

2. The undersigned has been advised that due to processing delays in the United Kingdom and Germany, there have been significant delays in obtaining service and receiving proof of service on the Defendants.

3. While Fed.R.Civ.P. 4(m) requires service within 90 days after filing of a Complaint, subdivision (m) does not apply to service in a foreign country under [Rule 4\(f\)](#) or [4\(h\)\(2\)](#), the provisions under which the Plaintiff is attempting to obtain service on the Defendants in this action.

4. Nevertheless, in an abundance of caution and in the interests of judicial economy, the Plaintiff requests an additional 90 days to obtain service of the Summons, Complaint and Standing Order upon the Defendants and respectfully requests this Honorable Court enter its Order enlarging the time to effectuate service accordingly.

5. This Motion is made in good faith and not for the purposes of harassment or delay.

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1 WHEREFORE, for the foregoing reasons, Plaintiffs, Valley Health System, LLC, DVH
2 Hospital Alliance, LLC, and Summerlin Hospital Medical Center, LLC, respectfully request an
3 additional ninety (90) days through and including July 27, 2022, in which to effectuate service of
4 Summons and Complaint upon the Defendants, TIF and URV as aforesaid and for such other and
5 further relief as the Court deems appropriate.

6 DATED this 27th day of April, 2022.

7 **WILEY PETERSEN**

8 */s/ Jason M. Wiley*

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*Attorneys for Plaintiffs Valley Health
Systems, LLC, DVH Hospital
Alliance, LLC and Summerlin
Hospital Medical Center, LLC*

IT IS THEREFORE ORDERED that Plaintiffs' motion for an enlargement of time
is GRANTED. Plaintiffs shall have until July 27, 2022 to effectuate service.

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27 DANIEL J. ALBREGTS
28 UNITED STATES MAGISTRATE JUDGE

DATED: April 29, 2022

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Wiley Petersen, and that on the 27th day of April, 2022, I caused to be served a true and correct copy of the foregoing **PLAINTIFF'S LOCAL RULE IA 6-1. MOTION FOR ENLARGEMENT OF TIME TO EFFECTUATE SERVICE** in the following manner:

(ELECTRONIC SERVICE) Pursuant to Rule 5-4 of the Local Rules of Civil Practice of the United States District Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed below at their last-known mailing addresses, on the date above written.

(ELECTRONIC E-MAIL)

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/s/ Caitlin Pascal

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